



RE: WER Confirmation Tests Memo

Dan Graham to: Powell, James E (DEC) 12/07/2010 07:58 PM
Cc: William Beckwith, "McGee, William D (DEC)", "Diamond, Jerry", "Rimelman,

History: This message has been replied to.

Jim and Bill -

We have the results of the total metals from the individual WER tests and will get those forwarded to you.

TSS and flow measurements were part of the parameters taken with the sample today.

Regarding the range of values, I will discuss that with TT to see if that is still something we can incorporate in this test sample. It was discussed at length and I don't recall where that was left at.

I hope that addresses your concerns and comments. Thanks to both you and Bill for your review and input. Stay tuned for updates and follow-up information.

Dan Graham, PE
Chuitna Project Manager
PacRim Coal, LP
1007 W 3rd Ave, Suite 304
Anchorage, AK 99501

Contact Information:
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dan@pacrimcoal.com

-----Original Message-----
From: Powell, James E (DEC) [mailto:jim.powell@alaska.gov]
Sent: Tuesday, December 07, 2010 4:57 PM
To: Dan Graham
Cc: Beckwith.William@epamail.epa.gov; McGee, William D (DEC); Diamond, Jerry; Rimelman, Ronald
Subject: RE: WER Confirmation Tests Memo

Dan, unless Pete has comments I concur with Bill's points regarding you 12/1/10 memo and description of our conversation today. jim

-----Original Message-----
From: Beckwith.William@epamail.epa.gov [mailto:Beckwith.William@epamail.epa.gov]
Sent: Tuesday, December 07, 2010 4:49 PM
To: Powell, James E (DEC)
Cc: Dan Graham; McGee, William D (DEC); Diamond, Jerry; Rimelman, Ronald

Subject: Fw: WER Confirmation Tests Memo

Jim - Sending this to summarize my thoughts from the conversation we just had concerning the attached Tetra Tech memo dated 12/1/10. That memo was sent to us by Dan Graham of PacRim Coal by email of 12/6/10 and concerns the metals mixture test that PacRim/Tetra Tech intends to conduct to evaluate if the individual proposed Chuitna site-specific metals criteria for Cu, Pb, Zn, and Al are protective in combination. It addresses the approach that Tetra Tech used to estimate the total metals concentrations necessary to ensure that the mixture contains dissolved metal at the proposed dissolved acute site-specific criteria concentration for each individual metal.

- To my knowledge we have not seen the total metals data from the individual WER test. That data should be reviewed as part of the review of the metals mixture test, and considered before any conclusions are drawn on the results of the metals mixture test or any proposal to calculate total recoverable WERs and total recoverable site-specific criteria (note that Dan's subsequent email, also of 12/6/10, indicated that the site water sample would be collected today for testing this week).

- As noted in my 11/19/10 email, TSS and stream flow should be added to the measurements to be conducted on the site water sample that were listed in Tetra Tech's 11/18/10 memo (page 3) concerning the metals mixture testing.

- As ADEC and EPA have suggested previously, PacRim should consider including a series of mixed metal concentrations/treatments in the test design, with treatments below and possibly above the proposed target mixture. This could be useful in the event that the proposed target mixture is toxic and might help ensure that the targeted dissolved concentrations are achieved.

Since my time around the office is limited, I am copying Dan and Tetra Tech now.

- Bill
206-553-2495

----- Forwarded by William Beckwith/R10/USEPA/US on
12/07/2010 04:40 PM

From: Dan Graham <dan@pacrimcoal.com>
To: "McGee, William D (DEC)"
<william.mcgee@alaska.gov>, William
Beckwith/R10/USEPA/US@EPA, "Powell, James
E (DEC)"
<jim.powell@alaska.gov>
Cc: "Diamond, Jerry"
<Jerry.Diamond@tetrattech.com>, "Rimelman,

Ronald" <Ronald.Rimelman@tetrattech.com>
Date: 12/06/2010 10:46 AM
Subject: WER Confirmation Tests Memo

Bill, Pete and Jim -

Attached is a memo from Tetra Tech to me explaining the final test procedure to be used for the WER confirmation tests. In our last discussion, Bill had some questions regarding total to dissolved ratio. This information is contained herein.

Please take a moment to review this document. If you have any question or comments regarding the final test, please get those to us by the close of business tomorrow.

Thanks! Hope you all had a good weekend.

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(See attached file: confirmatory testing 20101203
Memo Final.pdf)